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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

12 TSI AKIM MAIDU OF TAYLORSVILLE)

13 RANCHERIA,)

14 Plaintiff,)

15 v.)

16 UNITED STATES DEPARTMENT OF THE)

INTERIOR; SARAH JEWELL, in her official)

17 capacity as Secretary of the Interior; LAWRENCE)

18 S. ROBERTS, in his official capacity as Principal)

Deputy Assistant Secretary for Indian Affairs of the)

19 United States Department of the Interior; and)

DOES 1 to 100,)

20 Defendants.)

Case No. 16-cv-7189-LB

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT AND TO
CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER**

Pursuant to Civil Local Rule 7-12, the parties, Plaintiff, Tsi Akim Maidu of Taylorsville Rancheria, and Defendants, United States Department of the Interior, Sarah Jewell, in her official capacity as Secretary of the Interior, and Lawrence S. Roberts, in his official capacity as Principal Deputy Assistant Secretary for Indian Affairs of the United States Department of the Interior, (collectively, "Federal Defendants"), by and through their respective counsel, stipulate to extend the time for Defendants to respond to Plaintiff's complaint and to continue the initial case management conference scheduled for March 16, 2017. The parties state as follows:

1. On December 15, 2016, Plaintiff filed this action challenging Defendants' determination that as a matter of law Plaintiff lost status as a federally recognized Indian tribe when the United States sold the Taylorsville Rancheria in 1966 pursuant to Congressional mandate. ECF No. 1. Plaintiff seeks injunctive, declaratory, and mandamus relief to compel Defendants to find that Plaintiff never lost its status as a federally recognized Indian tribe;

2. On December 21, 2016, the U.S. Attorney's Office received by certified mail a copy of the summons and the complaint, making February 21, 2017, the deadline for Defendants to answer or otherwise respond to the complaint;

3. Defendants have been evaluating the claims raised in the complaint, but require additional time for their review;

4. The parties have conferred and agree to extend the time for Defendants to answer or otherwise respond to Plaintiff's complaint by approximately 60 days, from the current deadline of February 21, 2017, to April 20, 2017;

5. By Order dated December 19, 2016, the Court set an initial case management conference at 11:00 a.m. on March 16, 2017. ECF No. 5. The parties further stipulate to continue the initial case management conference from March 16, 2017 to May 25, 2017;

6. No prior extensions of time have been requested or granted;

7. This change will not alter the date of any other event or deadline already fixed by Court order, other than the date of the initial case management conference.

1 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendants that
2 Defendants will have until April 20, 2017 to respond to Plaintiff's complaint. The parties further
3 respectfully request that the initial case management conference be continued to May 25, 2017.

4 **SO STIPULATED.**

5 Dated: February 6, 2017

Respectfully submitted,

6 BRIAN J. STRETCH
United States Attorney

7 /s/ Michelle Lo
8 Michelle Lo
Assistant United States Attorney

9 Counsel for Defendants

10
11 Dated: February 6, 2017

/s/ Mogeew Weiss
Mogeew Weiss
WEISS LAW, PC
1151 Harbor Bay Parkway, Suite 134
Alameda, CA 94502
Tel: (510) 581-1857

14 Counsel for Plaintiff

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16 **ECF ATTESTATION**

17 In accordance with Civil Local Rule 5(i)(3), I, Michelle Lo, attest that I have obtained concurrence in
18 the filing of this document from the other signatory listed here.

19
20 **~~PROPOSED~~ ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED. Defendants are to answer or otherwise
22 respond to Plaintiff's complaint by April 20, 2017. The initial case management conference will be held
23 on May 25, 2017, at 11:00 a.m. The parties shall file a joint case management conference statement
24 seven days prior to the conference.

25 DATED: 02/07/2017


Hon. Laurel Beeler
United States Magistrate Judge